

IN THE COUNTY COURT OF THE 1st JUDICIAL DISTRICT
OF HINDS, COUNTY, MISSISSIPPI

Luther Williams Jr. Plaintiff DATE: 5-23-14
VS. Jackson Housing Authority Defendant No. 14-1659
ATT Telecommunications d BA
ATT

SUMMONS

TO THE SHERIFF OR ANY PERSON AUTHORIZED BY STATUTE:

You are hereby commanded to Summons:

Jackson Housing Authority
2747 Livingston Rd
Jackson, MS 39213

ATT Telecommunications
1025 Lenox Park Blvd NE
5th Floor
Atlanta, Georgia 30319

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS BY FILING YOUR ANSWER AS PROVIDED BY LAW AND/OR THE MISSISSIPPI RULES OF CIVIL PROCEDURE.

THIS ANSWER MUST BE FILED AS PROVIDED BY LAW AND/OR THE MISSISSIPPI RULES OF CIVIL PROCEDURE WITHIN 30 DAYS OF THE DATE YOU ARE SERVED OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

BARBARA DUNN

Circuit Clerk

Hinds County, Mississippi

BARBARA DUNN, CIRCUIT CLERK
HINDS COUNTY, FIRST DISTRICT
P. O. BOX 327
JACKSON, MS 39205

Luther Williams Jr.
~~ATTORNEY FOR~~

P.O. Box 9995

ADDRESS

Jackson, Ms. 39286
CITY, STATE, ZIP

(601) 918-8206
PHONE NUMBER

By



ATTEST A TRUE COPY

MAY 23 2014

BARBARA DUNN, CIRCUIT CLERK

BY Shale D.C.

EXHIBIT A

RETURN

IN THE COUNTY COURT OF HINDS COUNTY, MISSISSIPPI FIRST JUDICAL DISTRICT

Luther Williams, Jr.

PLAINTIFF

VS.

CIVIL ACTION NO.

14-1659

AT&T Telecommunications d/b/a

DEFENDANTS

AT&T; and Jackson Housing Authority,

et al.

FILED

MAY 23 2014

BARBARA DUNN, CIRCUIT CLERK

BY _____ D.C.

JUDICIAL QUESTION AT ISSUE

Whether Telecommunication products, such as telephone-television-internet service, meet the same legal standards as defined within landlord/tenant as other utilities provided to rental property when these services are denied and ultimately used to constructively evict a tenant?

COMPLAINT

(Jury Trial Requested)

Comes now the Plaintiff, Luther Williams, Jr., files this complaint against the Defendants, AT&T Telecommunications d/b/a AT&T, and Jackson Housing Authority, et al., and in support Hereof would respectfully show unto this court the following:

Plaintiff requests that the complaint not be limited to just the above listed claims.

IV.

Plaintiff further allege and would show that during the time of January 2013 thru September 2013 plaintiff lived at Golden Key Apartments located at 3430 Albermarle Road, Apt. C 112 Jackson, Mississippi 39213. These premises are operated by the Jackson Housing Authority who failed to accommodate the Plaintiff who being a disabled veteran and has to be assisted by a live in attendant because he is legally blind. Therefore violating the Plaintiff's civil rights and as an attempt to cover up these violations, Jackson Housing Authority began to retaliate against the Plaintiff in various ways to further not accommodate his need and request for his attending aide. Jackson Housing Authority failed cease their reasons to unjustly continue efforts to constructively eject Plaintiff and aide from apartment. Jackson Housing Authority and AT&T willfully without legal authority did sabotage the phone, cable tv, and internet service on July 28, 2013. Plaintiff paid monthly working service until AT&T suspended reduced phone service to a 911 emergency out calls only from July 28, 2013 until October 2013. AT&T failed to restore full service and still charged the full amount for service that AT&T knew or should have known that the charges to be false and willfully incorrect. AT&T, without consideration of Plaintiff's constant complaints, failed to address Plaintiff's dispute. AT&T disconnected all services in spite still being paid monthly \$40.00 plus, for a reduced 911 emergency telephone service.

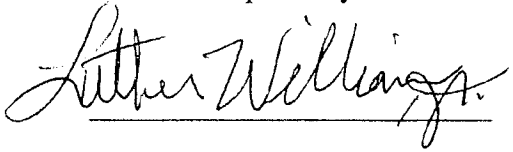
V.

Plaintiff alleges and would show that as a direct and proximate result of the intentional and willful misconduct and negligent acts of the defendants, the plaintiff was caused to physically move out from Golden Key Apartments to avoid the constant acts of torture from Jackson

Housing Authority and AT&T which denied his quiet enjoyment of the premises. Plaintiff was constructively evicted out of the apartment on September 2013 and has not been allowed to enjoy the continuing monthly rent paid to Jackson Housing Authority of \$455.00 per the lease agreement. Since September 2013, plaintiff, as a result hereof, suffers emotional distress, including additional anxiety, embarrassment and inconvenience.

Wherefore, the Plaintiff, Luther Williams, Jr., sues and demands judgment of and from the Defendant AT&T Telecommunications, and Defendant Jackson Housing Authority, et al, \$250,000.00 compensatory damages and \$250,000.00 punitive damages, together with all cost expended herein.

Respectfully Submitted

A handwritten signature in cursive script, reading "Luther Williams Jr.", is written over a horizontal line.

Luther Williams Jr., Plaintiff Pro se

P.O. Box 9995

Jackson, Mississippi 39286

(601) 918-8206

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<u>274 Livingston Rd</u>	<u>1025 Henn Park Blvd NE</u>
<u>Jackson, MS 39213</u>	<u>5th Floor</u>
	<u>Atlanta, Georgia 30319</u>

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RECEIVED

MAY 28 2014

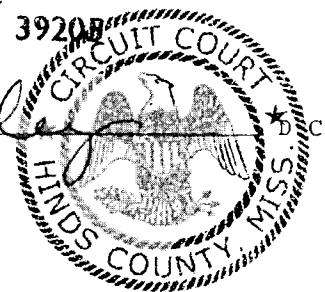
AT&T MOBILITY
LEGAL DEPARTMENT

BARBARA DUNN

Circuit Clerk
Hinds County, Mississippi

BARBARA DUNN, CIRCUIT CLERK
HINDS COUNTY, FIRST DISTRICT
P. O. BOX 327
JACKSON, MS 39208

BY

ShaleLuther Williams Jr.~~ATTORNEY FOR~~P.O. Box 9995

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